

ATM Grupa SA: Code of Ethics

The hereby defined ethical guidelines shall apply to both employees and collaborators of ATM Grupa SA with registered seat in Bielany Wrocławskie, and of all the member companies of the ATM Grupa SA capital group which will hereinafter be jointly referred to as "ATM companies".

The term "employee" shall hereinafter apply to all those employed by ATM companies pursuant to labour legislation, whereas the term "collaborator" shall apply to individuals cooperating with ATM companies on the basis of civil law agreements, especially including contracts for specific tasks, and fee-for-task agreements.

The present *Code of Ethics* defines ways of conduct we wish to see effectuated both in relations with third parties and within the internal environment of ATM companies.

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1. Conformity with legal regulations and the code of ethics

ATM Companies effectuate their activity pursuant to valid legal regulations and following a code of ethics adequate for responsible and diligent businesses acting both on the local Polish market, and internationally.

The basic values for ATM companies are integrity, diligence and transparency. These guidelines apply to accountancy records, legal matters, as well as to documents directly connected to TV and film productions. ATM companies expect those guidelines to be met by both their own employees and their collaborators or business partners.

The guidelines expressed above are crucial for ATM companies also due to the fact that some of them are listed at the Warsaw stock exchange.

2. Equal treatment policy

ATM companies follow a policy of equal treatment and equal opportunities. Decisions regarding employment or collaboration are made based upon competence-related criteria, i.e. especially the level of professionalism and the number of professional skills. It is forbidden to make this kind of decisions following non-trade-related criteria, especially ones relating to gender, sexual orientation, age, health, religion, nationality, or other aspects of this kind connected exclusively to the candidates' private sphere.

3. Intellectual property protection

ATM companies put a lot of emphasis on intellectual property protection.

ATM companies employees and collaborators are obligated to respect intellectual property rights of both ATM itself, and all the third parties, especially within the field of TV and film production. It is strictly forbidden for them to undertake actions that could infringe the rights of third parties or harm the personal interest of any entity.

ATM companies obligate all their employees and collaborators to keep confidential all the information regarding the activity of ATM companies, unless the scope of disclosure of such information has been directly defined by the ATM companies board, or a legal obligation arises to disclose such information.

The present stipulation is especially important in connection with the status of publically owned company listed at the stock exchange. It is prohibited to use and/or disclose any information which could directly or indirectly influence the stock price of listed ATM companies.

Submitting any information regarding ATM companies and their activity to state and local government bodies, as well as to the media, can be effectuated exclusively by the members of ATM companies boards and persons directly authorised by them.

4. Conflicts of interests

ATM companies employees and collaborators are expected to avoid situations constituting or leading to a conflict of interests.

Employing, establishing a cooperation or a business relationship with individuals who are relatives or family members of ATM companies employees or collaborators should be reported directly to the immediate superior or the person in charge of the project in question, including particular TV or film production.

ATM companies obligate their employees and collaborators to exclusively apply transparent and market-ruled procedures for selecting suppliers and sales representatives.

If an employee/collaborator chooses to purchase shares of stock issued by stock-exchange-listed ATM companies, they to be aware that purchase of such securities involves a certain risk, and that the decision to effectuate the purchase is a strictly private matter. Furthermore, before performing any action involving ATM companies securities employees/collaborators need to remember that it is prohibited by law to take advantage of business-related or confidential information for the purpose of trading securities. The legal regulations on securities expressly prohibit purchase, sales, any other form of turnover or consulting regarding securities of companies about which the person in question possesses significant confidential information. This stipulations applies to acting both on one's own behalf and in favour of third parties. Disclosing this kind of information to third parties is prohibited. The term "significant confidential information" is to be understood as any and all information the public disclosure of which could influence stock price or investors' decisions to purchase or sell shares of stocks of a particular company.

5. Political and ideological activity

The ability to express one's opinions and beliefs is a key indicator of freedom. Everyone has a right to convey their outlooks, yet only in a form and to an extent which does not harm or offend the feelings, dignity and freedom of others. Employees and collaborators of ATM companies should remain independent in terms of ideology and politics at the time of performing their professional tasks and/or services.

ATM companies do not engage in political activity.

ATM companies do not ban their employees and collaborators from political activism on the condition that within their activity they will refrain from any use of the ATM brand name, ATM's registered trademarks, or any other ATM assets. Also, the activity in question must not lead third parties to believe that it is in any form sponsored or supported by ATM companies.

The political beliefs and activity of employees and collaborators must not collide with the activity and time necessary to execute professional tasks and duties, especially ones performed in favour of ATM companies' business partners.

Everyone enjoys the freedom of political, social and religious beliefs and should at the same time respect the views and beliefs of others.

Inside ATM companies no political or ideological publicity is allowed, no matter its character. When at work, it is forbidden to establish campaign teams, canvass, collect signatures, or perform activities in favour of specific political parties or religious and ideological groups. It is also prohibited to encourage collaborators to join such groups or endeavours.

ATM companies have at their disposal their own e-mail and Internet systems. Both those systems should be primarily used for purposes connected to professional duties. ATM companies reserve the right to inspect them in order to verify their adequate and appropriate use. It is strictly prohibited to use e-mail or the Internet for purposes which are inappropriate, indecent or contrary to the present code of ethics. This stipulation also applies to sending messages that another person could deem offensive and/or a form of harassment: text messages, images, jokes that can be perceived as discriminatory in terms of race, skin colour, religious beliefs, gender, age, nationality or impairment.

6. Impeding corruption and bribery

ATM companies employees and collaborators are expected to avoid any form of conduct which could lead to a suspicion of corruption or bribery, both passive and active.

The ban on any form of corruption or bribery shall apply to relations with both public officials and state officers, and business entities and private individuals.

ATM companies employees and collaborators, when effectuating activities in favour of ATM companies, are obligated to avoid situations which could be considered acts of unfair competition, especially in terms of setting prices, sale conditions and performance of services.

7. Prevention of harassment and mobbing

Every employee and collaborator of ATM companies is by law protected from harassment, mobbing and any form of persecution.

ATM companies do not tolerate forms of conduct which may be considered offensive towards personal freedom or dignity. The present paragraph refers especially to offences over race, gender, sexual orientation, religion, age, health, marital status, nationality and other aspect of private life.

Employees and collaborators of ATM companies are expected to treat one another, and any third party, with due respect and consideration for their rights.

Any ATM company employee or collaborator who feels they have become a victim of sexual harassment or discrimination, or: who has witnessed such practices, should immediately report that fact to the company board, after previously contacting the board secretary by e-mail and getting a time of appointment. Their report will be treated as confidential.

ATM companies cannot accept responsibility for consequences resulting from acts of harassment or discrimination in case there is no information on the subject, or when the information is insufficient from the point of view of preventing such practices.

8. Measures to be taken in case on violating the law or the code of ethics

All ATM companies employees and collaborators should carefully read the present code of ethics and apply its content on a daily basis. All the ethical guidelines are available on the Internet at: www.atmgrupa.pl/en/zasady-etyki.

In case you have any questions or doubts regarding the scope of the ethical guidelines, please report them directly to the boards of respective ATM companies.

If an employee or a collaborator of an ATM company notices a situation where:

1. an infringement of the code of ethics can occur,
2. an employee or a collaborator of ATM Bielany Wrocławskie or any of the ATM companies is violating the stipulations of the present document,

they are expected to report it directly to the ATM company board, after previously contacting the board secretary by e-mail and getting a time of appointment.

In order to ensure confidentiality the reports can only be effectuated in form of a direct conversation with representatives of the ATM companies board.

Notifications of violations of the code of ethics will be always treated as confidential. If the person reporting the violation does not wish for her personal data to be disclosed, the verification process will be performed discreetly, maintaining the anonymity of the person who effectuated the notification.

9. Closing stipulations

Every employee and collaborator of ATM companies should act according to the guidelines described in this *ATM Grupa Code of Ethics*, and expect their co-workers and superiors to do so too.

The body in charge of supervising and/or modifying the present code is the board of ATM GRUPA SA with registered seat in Bielany Wrocławskie. The responsibility for implementing and enforcing the contents of the present code, and notifying them to all those whom they may concern, rests on the boards of respective ATM GRUPA companies which are expected to take adequate measures.